

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

Chapter 11

22 Maple Street, LLC, et al.,

Case No. 18-40816-NHL

Case No. 18-40817-NHL

Case No. 18-40818-NHL

Case No. 18-40819-NHL

Debtors.

Jointly Administered
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**DECLARATION IN SUPPORT OF MOTION TO SCHEDULE
HEARING ON SHORTENED NOTICE TO CONSIDER
MOTION TO APPROVE BIDDING PROCEDURES**

Kevin J. Nash declares the following under penalties of perjury pursuant to 28 U.S.C. § 1746:

1. I am a member of the law firm of Goldberg Weprin Finkel Goldstein LLP, counsel for 22 Maple Street, LLC ("Maple"), 25 Oriol Drive, LLC ("Oriol"), and 59 Coolidge Road, LLC ("Coolidge") (collectively, the "Selling Debtors"), and as such I am fully familiar with the facts set forth herein.

2. This Declaration is filed pursuant to Local Rule 9077-1(c) in support of the Selling Debtors' motion seeking an expedited hearing on shortened notice on their motion to obtain approval of bidding procedures to be used in connection with the sale of the Selling Debtors' real property.

3. An expedited hearing is being requested to coordinate the Debtors' motion to set bidding procedures in the Bankruptcy Court with the adjourned hearings in the cases for June 28, 2018, as well as a corresponding set of procedures to be filed in the state court receivership action.

4. We have learned from the other case involving 90 West LL, and these bidding procedures address the Court's concern to approve only the sale of the real estate properties and not exercise jurisdiction over the nursing homes.

5. Thus, we request that the bidding procedures be considered at the June 28, 2018 hearing already scheduled in these Chapter 11 cases for 4:30 p.m.

6. We see no prejudice, since the bidding procedures are part of an overall settlement being negotiated with the Debtors' lender, Capital Funding LLC ("Capital"), which has been intimately involved in the preparation of the bid procedures order and is the only party truly impacted, since all other creditors will be paid in full.

7. Bankruptcy Rule 2002(b) provides for a 21 day time period for hearings to consider the sale of real property. However, Rule 9006(c) permits the deadlines set in Rule 2002(b) to be reduced for "cause shown".

8. The Debtors submit that cause exists for proceeding on shortened notice. We have developed bidding procedures that promote a transparent process even though the Brach Group will be the Stalking Horse.

WHEREFORE, the Debtor respectfully requests entry of the prefixed Order, together with such other and further relief as this Court deems just and proper.

Dated: New York, NY
June 22, 2018

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By: /s/ Kevin J. Nash